AmerGen Energy Company
Oyster Creek
US Route 9 South, P.O. Box 388
Forked River, NJ 08731-0388

www.exeloncorp.com

AmerGen SM
An Exelon Company

NEI 99-04

RA-07-038

December 28, 2007

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555 - 0001

Oyster Creek Nuclear Generating Station
Facility Operating License No. DPR-16
NRC Docket No. 50-219

Subject: Commitment Change Summary Report – 2005 and 2006

Enclosed is the 2005 and 2006 Commitment Change Summary Report for Oyster Creek Nuclear Generating Station. The content and format of information submitted in this report is in accordance with the guidance provided by NEI 99-04.

Please contact Calvin Taylor at (609) 971-4031 if any further information or assistance is needed.

Sincerely,

Timothy S. Rausch
Vice President, OCNGS

Enclosure

cc: S. J. Collins, Administrator, USNRC Region I
G. Edward Miller, USNRC Senior Project Manager, Oyster Creek
Marc Ferdas, USNRC Senior Resident Inspector, Oyster Creek
File No. 07101

A001
NRR

2005 and 2006 Commitment Change Summary Report for Oyster Creek Nuclear Generating Station

The following six NRC Commitments tracked in the Oyster Creek Nuclear Generating Station (OCNGS) commitment-tracking database were changed during the calendar year 2005. These changes were evaluated in accordance with Exelon Procedure LS-AA-110, Commitment Management, and determined to require NRC notification during the next Commitment Change Summary Report consistent with NEI 99-04 guidance.

Response to IEB 80-10

Original Commitment – In response to IEB 80-10, OCNGS credited ESW and ICS system Radiation Monitors to detect potentially unmonitored leak paths.

Revised Commitment – The process monitors were determined to be ineffective and grab sampling was implemented instead.

Justification – The change was evaluated and a UFSAR change (SE 000661-017) processed that determined prior NRC notification was not required.

Relief to NUREG-0619

Original Commitment – An NRC Safety Evaluation was issued to GPUN in 1994 to allow use of a linear phased-array UT technique in lieu of a PT exam for the FW and CRD return nozzle as relief to NUREG-0619 requirements.

Revised Commitment – The OCNGS FW nozzle exam requirements were revised to implement the recommendation of GE NE-523-A71-0594 in lieu of the NRC approved relief request and SER.

Justification – NUREG-0619 identified the ISI requirements based on the state-of-the-art in the late 1970s. The required ISI included both UT of the entire nozzle and dye penetrant testing (PT) of various portions of blend radius and bore. Since the issuance of NUREG-0619, significant advances have been made in UT inspection technology, and significant field experience has been gained on the successful prevention of cracks in feedwater nozzles. As a result of these improvements, BWROG proposed that UT inspections replace the PT inspections specified in NUREG-0619, and that UT inspection intervals be based on sparger-sleeve configurations and specific UT inspection methods as described in the report GE NE-523-A71-0594-A, Revision 1. This report specifies UT of specific regions of the nozzle inner blend radius and bore. The nozzle inner blend radius region is more limiting from a fracture mechanics point of view than the bore region. In a letter from S. A. Richards to W. Glenn Warren, dated

March 10, 2000, "Final Safety Evaluation of BWR Owners Group Alternative BWR Feedwater Nozzle Inspections, " the NRC staff accepted the proposed BWROG inspection methods and fracture mechanics analysis. These NRC-approved BWROG inspection methods and inspection intervals are currently being used at Oyster Creek.

LER 02-002-02

Original Commitment – OCNGS committed to limit operation between 25 and 90% reactor power to 30-days without a backup pressure regulator

Revised Commitment – The commitment was modified to allow this condition if a specific analysis is performed for operation in this region.

Justification – This change was justified because interim thermal limit penalties ensure all Technical Specification limits would be met if the operating pressure regulatory failed while operating between 25% and 90% power.

LER 2004-005

Original Commitment – OCNGS committed to fully developing a stem strain gauge testing technique for MSIV testing to monitor rib wear and implement the technique as a Planned Maintenance work item.

Revised Commitment – Changed commitment date from March 30, 2005, to refueling outage 1R21.

Justification – Additional time for implementation was required and strain gauge testing was not to be performed prior to the refueling outage. Pre-defined planned maintenance activities were subsequently established to close this commitment.

Response to GL 89-13

Original Commitment – OCNGS stated in response to GL 89-13 that biennial reviews of service water procedures provide reasonable assurance that they are adequate and reflect plant configuration.

Revised Commitment – The commitment was deleted.

Justification – The statement made in response to GL 89-13 was the method used at the time to ensure procedural adequacy. Since that time, the biennial review process is no longer implemented at OCNGS having been replaced with standard Exelon administrative procedures that ensure the adequacy of procedures that involve the service water system and safety related equipment cooled by service water.

LER 2005-002

Original Commitment – OCNGS experienced a Generator Load Rejection Reactor Scram caused by a grid transient that resulted from a lightning arrestor failure at the Manitou Substation. In the LER, OCNGS committed to a corrective action for the system manager to review First Energy work practices during this event to determine if improvements are warranted.

Revised Commitment – The implementation date was extended from October 30, 2005, to December 15, 2005. The commitment to review First Energy work practices was subsequently completed.

Justification – Additional time was required for the external review and input from organizations outside the control of OCNGS.